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Attorney-Applicant for Crimson Investment Group, LLC, Debtor-in-Possession.

IN THE BANKRUPTCY COURT OF THE UNITED STATES
FOR THE DISTRICT OF OREGON

In re:)	Case No. 16-32747-tmb11
)	
Crimson Investment Group, LLC)	MOTION TO CONSOLIDATE INITIAL
)	RULE 2015 REPORT AND TO SET DUE
)	DATE FOR INITIAL RULE 2015 REPORT
Debtor-in-Possession.)	

The Debtor in Possession, by and through their attorney-applicant, Theodore J. Piteo, hereby moves the Court for an Order authorizing consolidation of the Rule 2015 report due for the month of July 2016 with the report due for the month of August 2016 into a single report and making that report due by September 21, 2016. In support of this motion, the Movant represents:

- 1) Movants' case under chapter 11 of the Code was filed on July 14, 2016 and Movant is presently serving as debtor-in-possession.
- 2) Movant has filed with the court an application to employ the attorney-applicant but that Motion has not yet been ruled on by this court.
- 3) Movant has an obligation to file reports pursuant to Fed. Rule Bankr. Proc 2015 and the Court's Order of Designation dated July 14, 2016 set the initial report due date as August 22, 2016. As a result of this Motion, Movant's initial reporting obligation for

the month of July will cover the time period from July 14 through July 31st and will be due on September 21, 2016.

- 4) The Movant's Accountant-Applicant was delayed in responding to requests for proof of activity during the period in July due to summer vacation.
- 5) If granted, Movants initial Rule 2015 report will cover the time period from July 14, 2016 through August 31, 2016 and will be due by September 21, 2016. All subsequent reports will cover the appropriate reporting period and will be due by the 21st of the month following the end of the reporting period as ordered by the Court
- 6) Prior to filing of this Motion, the Movant conferred with the CPA, Tammy Combs, for the United States Trustee and received authority to represent to the Court that the United States Trustee has no objection to this Motion and the requested relief.

Dated this 22nd day of August, 2016

Respectfully Submitted By:

/s/ Theodore J. Piteo
Michael D. O'Brien, OSB#951056
Theodore J. Piteo, OSB#090311
Attorney-Applicant for
Crimson Investment Group, LLC,
Debtor-in-Possession

In re Crimson Investment Group, LLC
Case No. 16-32747-tmb11

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2016, I served the foregoing “Motion to Consolidate Initial Rule 2015 Report and to Set Due Date for Initial Rule 2015 Report” **on** the following parties by mailing to each at the address below in a sealed envelope, with postage prepaid, and deposited in the United States Post Office:

Crimson Investment Group, LLC
c/o Tracey Baron, Manager
1701 SE Oak Shore Ln
Portland, OR 97267

I further certify that the following person(s) will be served electronically via ECF when the foregoing document is filed with the court:

RENEE M PARKER on behalf of Creditor Bosco Credit II, LLC
rmparker@wrightlegal.net, bkgroup@wrightlegal.net, sbennett@wrightlegal.net, bkudgeneralupdates@wrightlegal.net

THEODORE J PITEO on behalf of Debtor Crimson Investment Group, LLC
ted@pdxlegal.com, enc@pdxlegal.com; hugo@pdxlegal.com; reception@pdxlegal.com; seven@pdxlegal.com

US Trustee, Portland
USTPRegion18.PL.ECF@usdoj.gov

JESSE A BAKER on behalf of Creditor U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for First F
ecforb@aldridgepите.com, JPB@ecf.inforuptcy.com; jbaker@aldridgepите.com

/s/ Hugo A. Zollman
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